Remarks

This Application has been carefully reviewed in light of the Office Action mailed April 10, 2003. At the time of the Office Action, Claims 1-29 were pending in this patent application. In the Office Action, the Examiner rejected Claims 1-29. Claims 1, 3, 4, 7, 8, 14, 16-24 and 26 have been amended to more clearly claim what the inventors believe to be the invention. Applicants respectfully request reconsideration and favorable action in this case.

Claim Objections

The Examiner objects to Claims 16 and 26 because these claims are exact duplicates of Claims 15 and 25 respectively. Applicants disagree and point out that Claim 15 recites: "The system of Claim 14, wherein the *local* rendering system comprises . . ." while Claim 16 recites: "The system of Claim 14, wherein the *remote* rendering system comprises . . ." Similarly, Claim 25 recites: "The system of Claim 14, wherein the *first* rendering system comprises . . ." while Claim 26 recites: "The system of Claim 14, wherein the *second* rendering system comprises . . ." Regardless, other portions of Claims 16 and 26 have been amended, as shown above. Applicants therefore request the objections to Claims 16 and 26 be withdrawn.

Section 112 ¶ 2 Rejection

The Examiner has indicated that Claim 3 recites the limitation "the first scheduler" in line 3 of the claim, and that there is insufficient antecedent basis for this limitation in the claim. Claim 3 has been amended to provide sufficient antecedent basis. Applicants therefore request the rejection of Claim 3 under Section 112 ¶ 2 be withdrawn.

Section 102 Rejection

Claims 1, 2, 7, 14, 21-24 and 27-29 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,438,576 to Huang, et al. ("*Huang*"). Applicants respectfully traverse.

Claim 1, as amended, recites:

> A computerized method for rendering images, comprising:
> receiving from a client a render job having an associated job profile and a plurality of frames;
> distributing via a communications medium a first frame of the plurality of frames to a first one of a plurality of render servers and a second frame of the plurality of frames to a second one of the plurality of render servers based at least in part on the job profile;
> rendering the first and second frames concurrently at the first and second render servers; and
> forwarding the rendered first and second frames to a network storage system for retrieval by the client.

Huang does not disclose, teach or suggest this combination of limitations, whether *Huang* is considered alone or in combination with any other cited reference or with information generally available to those of ordinary skill in the art at the time the invention was made.

For example, *Huang* fails to disclose, teach or suggest "receiving from a client a render job having . . . a plurality of frames" and "distributing via a communications medium a first frame of the plurality of frames to a first one of a plurality of render servers and a second frame of the plurality of frames to a second one of the plurality of render servers . . .," as recited in Claim 1. Although *Huang* discloses using one or more proxy servers to perform a rendering process, *Huang* fails to disclose, teach or suggest distributing frames of a render job to more than one server for processing.

Huang discloses that "[i]f *an object* rendering can be *staged, e.g., different resolution rendering*, it can be performed by more than one of the proxies" and "a participating proxy . . . can choose to (a) perform the complete object rendering by itself, (b) perform a *partial rendering* if the rendering process can be staged, or (c) do nothing and let another proxy perform the rendering task." (Col. 3, Lines 32-47) (emphasis added). *Huang* further discloses that "[w]hen *a requested object* passes through the proxy network, any proxy server . . . can perform a complete or partial rendering based on the associated RHI. For example, if the entire rendering *process can be partitioned* into two or more steps, a given one of the proxy servers . . . may decide to perform only one of the rendering steps, and to then forward the partially rendered object to another proxy server . . ." (Col. 6, Lines 9-16) (emphasis added).

Thus, *Huang* discloses distributed rendering of "an object" in "stages" or "steps" using different proxy servers, which cannot be equated with the distributed rendering of render job having a plurality of frames using multiple render servers, as recited in Claim 1. First, nowhere does *Huang* disclose, teach or suggest that such "an object" could be "a render job having . . . a plurality of frames," as recited in Claim 1. To the contrary, the examples of "an object" provided by *Huang* include (1) *an* image, *an* image file or *an* image object (see Col. 6, Lines 59-60; Col. 10, Lines 20-23; Col. 13, Lines 4-7) and (2) *an* HTML text (Col. 6, Lines 59-63). Thus, since *Huang* discloses rendering of "an object" in "stages" or "steps," it is clear that such "stages" or "steps" are portions of the actual *process* of rendering "an object" as defined by *Huang*. To illustrate, as recited above, *Huang* describes a "staged" rendering process as the "rendering of an object into different forms or resolutions." (Col. 1, Lines 57-58; see also Col. 3, Lines 32-37). Thus, the rendering of "an object" in "stages" or "steps" as disclosed by *Huang* clearly cannot be equated with the distributed rendering of a plurality of frames of a render job by multiple render servers as recited in Claim 1. For at least these reasons, *Huang* fails to disclose, teach or suggest "receiving from a client a render job having . . . a plurality of frames" and "distributing via a communications medium a first frame of the plurality of frames to a first one of a plurality of render servers and a second frame of the plurality of frames to a second one of the plurality of render servers . . . ," as recited in Claim 1.

As another example, *Huang* fails to disclose, teach or suggest "rendering the first and second frames concurrently at the first and second render servers," as recited in Claim 1. As discussed above, *Huang* discloses "if the entire rendering process can be partitioned into two or more steps, a given one of the proxy servers . . . may decide to perform only one of the rendering steps, and *to then forward* the partially rendered object to another proxy server . . ." (Col. 6, Lines 12-16) (emphasis added). Nowhere does *Huang* disclose, teach or suggest performing steps or stages of a rendering process at multiple proxy servers *concurrently*. Thus, even assuming that *Huang* disclosed distributing a first frame of a render job to a first render server and a second frame of the render job to a second render server (which *Huang* does not disclose, as discussed above), *Huang* would still fail to disclose, teach or suggest "rendering the first and second frames concurrently at the first and second render servers," as recited in Claim 1.

For at least the reasons given above, amended Claim 1 is allowable over *Huang*. Amended independent Claims 8 and 21 are also allowable over *Huang* for analogous reasons. Thus, Applicants respectfully request reconsideration and allowance of independent Claims 1, 14 and 21, together with Claims 2, 7, 22-24 and 27-29 which depend therefrom. If the Examiner maintains the rejection of any of dependent Claims 2, 7, 22-24 and 27-29, Applicants reserve the right to provide more detailed remarks concerning the allowability of such claims.

Section 103 Rejection

Claims 3-6, 8-13, 15-20, 25 and 26 were rejected under 35 U.S.C. § 103(e) as being unpatentable over *Huang* in view of U.S. Patent 6,539,445 to Krum ("*Krum*"). Applicants respectfully traverse.

Claim 8, as amended, recites:

A system for rendering images, comprising:
a plurality of render servers operable to render a render job having an associated job profile and a plurality of frames;
a resource database comprising resource information regarding the plurality of render servers; and
a schedule server coupled to the render server via a communications medium and operable to distribute a first frame of the plurality of frames to a first one of a plurality of render servers and a second frame of the plurality of frames to a second one of the plurality of render servers based on a comparison of the job profile and the resource information.

The proposed combination of *Huang* and *Krum* does not disclose, teach or suggest this combination of limitations. For example, the proposed *Huang-Krum* combination fails to disclose, teach or suggest "a schedule server coupled to the render server . . . and operable to distribute a first frame of the plurality of frames to a first one of a plurality of render servers and a second frame of the plurality of frames to a second one of the plurality of render servers . . . ," as recited in Claim 8.

First, as discussed above regarding Claim 1, *Huang* fails to disclose, teach or suggest the distributed rendering of a render job having a plurality of frames using a plurality of

render servers. Moreover, the Examiner acknowledges that *Huang* fails to disclose "a schedule server coupled to the render server (proxy server)." (Office Action, page 6).

Second, regardless of whether *Krum* discloses "a system for distributing jobs according to a method for load balancing between a plurality of servers," as asserted by the Examiner, *Krum* fails to disclose, teach or suggest anything regarding the distributed rendering of a render job, much less distributing a first frame of a render job to a first render server and a second frame of the render job to a second render server.

Therefore, the proposed *Huang-Krum* combination fails to disclose, teach or suggest at least "a schedule server coupled to the render server . . . and operable to distribute a first frame of the plurality of frames to a first one of a plurality of render servers and a second frame of the plurality of frames to a second one of the plurality of render servers . . . ," as recited in Claim 8.

For at least the reasons given above, amended Claim 8 is allowable over the proposed *Huang-Krum* combination. Thus, Applicants respectfully request reconsideration and allowance of independent Claim 8, together with Claims 9-13 which depend from Claim 8. If the Examiner maintains the rejection of any of dependent Claims 9-13, Applicants reserve the right to provide more detailed remarks concerning the allowability of such claims.

In addition, Claims 3-6, 15-20, 25 and 26 are allowable at least because they depend from amended independent Claims 1, 14 and 21, which have been shown above to be allowable. Applicants respectfully request reconsideration and allowance of Claims 3-6, 15-20, 25 and 26. If the Examiner maintains the rejection of any of Claims 3-6, 15-20, 25 and 26, Applicants reserve the right to provide more detailed remarks concerning the allowability of such claims.

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Conclusion

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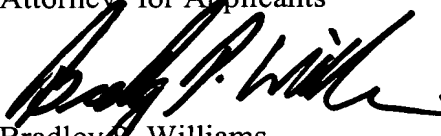
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Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Bradley P. Williams, Attorney for Applicants, at the Examiner's convenience at (214) 953-6447.

Although no fees are believed to be required by this paper, the Commissioner is hereby authorized to charge any appropriate fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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